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**TO: Economic Support Supervisors
Economic Support Lead Workers
Training Staff
Child Care Coordinators
W-2 Agencies
Workforce Development Boards
Job Center Leads and Managers**

**FROM: Janice Peters
W-2 Policy Section
Bureau of Wisconsin Works
Division of Workforce Solutions**

DWS OPERATIONS MEMO

No: 06-23 Correction 6/5/2006

DATE: 05/25/2006

FS	<input type="checkbox"/>	MA	<input type="checkbox"/>	SC	<input type="checkbox"/>
CTS	<input type="checkbox"/>	CC	<input type="checkbox"/>	W-2	<input checked="" type="checkbox"/>
FSET	<input type="checkbox"/>	EA	<input type="checkbox"/>	CF	<input type="checkbox"/>
JAL	<input type="checkbox"/>	JC	<input type="checkbox"/>	RAP	<input type="checkbox"/>
WIA	<input type="checkbox"/>	Other EP	<input type="checkbox"/>		

PRIORITY: HIGH

SUBJECT: NEW W-2 BACKDATING AND FUTURE-DATING POLICY

CROSS REFERENCE: Operations Memo 06-20 *Wisconsin Works (W-2) Move Placements Project – Conversion Process*

Administrator's Memo 06-05 *Wisconsin Works Move Placements Project*

EFFECTIVE DATE: June 5, 2006

PURPOSE

The purpose of this memo is to convey new backdating and future-dating rules for both beginning and ending a W-2 episode and employment position on the new W-2 placement screen WPWW. This memo does not address backdating or future-dating other information in the Work Programs subsystem, e.g., assigned activities, employability plan dates, assessment dates, etc. For information on backdating Work Program information other than W-2 employment positions, refer to the Wisconsin CARES Guide, Section 2 – Work Programs, Appendix 06 – Work Programs Backdating Rules.

Also, included at the end of the memo is a chart that compiles all of the new backdating and future-dating rules identified in this memo. This chart can be removed and used as a quick reference tool for Financial and Employment Planners (FEPs).

BACKGROUND

On June 2, 2006, the Division of Workforce Solutions will roll out the Move Placements project. This project presented an opportunity to review and revise W-2 episode and W-2 employment position placement ("W-2 Placement") backdating and future-dating rules so that they better align with W-2 program expectations. As is the case with many rules, there are exceptions. If there are any exceptions to the rules stated below, that is indicated accordingly.

The backdating and future-dating rules apply to the new CARES Work Program screen WPWW (Wisconsin Works Information).

WPWW	WISCONSIN WORKS INFORMATION	05/15/06 08:37
CASE: 0011544001		XID123 A WORKER
LAST UPDATED: 05 15 06		
DC: ____	SEQ NUM: 001	
CASE MANAGER: XID123	FEP ID: XID123	PRIMARY WORKER: XID234
INITIAL W-2 ELIGIBILITY DATE: 01 04 2006		
❶ W-2 BEGIN DATE: 01 10 2006	❷ W-2 END DATE: ____	
PARTICIPANT PIN: 1234567890		
NAME: FIRSTADULT	M LASTNAME	
PLACEMENT: CMF CASE MGMT FOLLOW UP		
❸ PLACEMENT BEGIN DATE: 05 15 2006	❹ PLACEMENT END DATE:	
-----INDIVIDUALS ELIGIBLE FOR PLACEMENT-----		
NAME: FIRSTADULT	M LASTNAME	PIN: 1234567890
NAME: SECONDAULT	M LASTNAME	JR PIN: 2345678901
PF13 NEW EPISODE		

There are four fields relevant to this topic located on WPWW: ❶ W-2 Begin Date, ❷ W-2 End Date, ❸ Placement Begin Date and ❹ Placement End Date. Some of the rules depend upon the W-2 placement type, e.g., paid placement or case management placement. More so, some rules depend upon where in a W-2 episode a placement falls, e.g., *initial* W-2 employment position placement in a single W-2 episode or *subsequent* W-2 employment position placement in a single W-2 episode. *Subsequent* placement means a second or greater placement in a single W-2 episode.

NEW RULES

W-2 BEGIN DATE

Backdating Rule: *For an initial W-2 placement, the W-2 Begin Date can be backdated 10 calendar days or back to the date eligibility was confirmed as a pass, whichever is later. The Placement Begin Date for an initial W-2 placement must be the same as the W-2 Begin Date. The W-2 Begin Date is protected and cannot be changed after the initial W-2 placement is made.*

Exception! *For an initial CMC placement, the W-2 Begin Date can be backdated up to the date eligibility was confirmed as a pass or up to the child's DOB, whichever is later. The Placement Begin Date must be the same as the W-2 begin date.*

Backdating Rule: *The W-2 Begin Date must be after the W-2 End Date of the previous W-2 episode. It cannot be prior to the date eligibility actually began.*

Future Date Rule: *A W-2 Begin Date cannot be a future date.*

W-2 END DATE

Backdating Rule: *The W-2 End Date cannot be backdated prior to the start of the W-2 participation period when it is entered after the W-2 Pulldown cycle. Also, it cannot be prior to the W-2 Begin Date.*

Future Date Rule: *A W-2 End Date cannot be a future date.*

Exception! An initial or subsequent CMC placement W-2 End Date may be a future date of up to 10 calendar days from the current date if the individual is leaving W-2 and not moving to a different placement.

If a CMC individual will remain in the W-2 program after the CMC placement ends, the W-2 placement change cannot be made until after CMC ends. If the worker enters a future W-2 End Date in error, the current W-2 episode cannot be reopened.

It is important to note here that ending a W-2 episode is accomplished by entering a W-2 End Date and not a Placement End Date. The Placement End Date is auto-populated by CARES with the W-2 End Date. If a new placement is entered then the Placement End Date of the previous W-2 placement is one day prior to the Placement Begin Date of the new W-2 placement.

PLACEMENT BEGIN DATE

Backdating Rule: *The Placement Begin Date for all initial W-2 placements in a W-2 episode can be backdated to the date eligibility was confirmed as a pass or backdated up to 10 calendar days, whichever is later.*

Exception! For *initial* CMC placements, the Placement Begin Date can be backdated to either the date the W-2 assistance group (AG) was confirmed as a pass or the baby's date of birth, whichever is later. An initial CMC Placement Begin Date is not subject to the 10 calendar day backdate limitation as on other W-2 placements.

Example: Mary applied for W-2 and was confirmed as a pass on May 12. Mary had a baby on May 16. The FEP places Mary in CMC effective May 16.

Backdating Rule: *The Placement Begin Date for all subsequent W-2 placements in a W-2 episode can be backdated for up to 10 calendar days prior to the current date.*

Exception! For *subsequent* CMC placements, e.g., CMC following a W-2 T, the Placement Begin Date for can be backdated to the date of the baby's date of birth and is not subject to a 10-day backdate limitation that applies to other subsequent W-2 placements in a W-2 episode.

The reason the rule is different for the subsequent CMC's is because a participant has up to 17 working days to report and verify the birth of a baby (up to 10 calendar days to report changes in circumstances and up to seven working days to provide verification)

There are valid reasons for backdating such as reopening a placement after an extension is granted and a placement has ended or to correct worker error. However, backdating should not be used to create a placement that should have been in place after a fact finding is conducted. In this situation, it is sufficient to issue a supplemental payment and add a note to case comments.

The FEP has to keep in mind that backdating placements may create problems with the payment calculation as well as with tracking monthly time limits, depending upon the type of placement that is backdated. In order to assist workers in creating correct payment amounts, if a FEP backdates a Placement Begin Date into the previous participation period after the W-2 Pulldown Cycle is run, CARES will display an informational message "ISSUE SUPPLEMENTAL PAYMENT." However, because the W-2 Pulldown Cycle typically runs around the 27th of the month and the participation period ends on the 15th of the month, this should seldom occur.

Example: The W-2 Pulldown Cycle is run on February 22. On February 24, a FEP backdates a change in placement from W-2 T to CSJ effective February 14. Because CARES has already calculated the W-2 T payment for the January 16 to February 15 participation period, the FEP must manually issue a supplement for the increase in payment.

If a FEP enters a backdated Placement Begin Date for an initial placement in a W-2 episode *after* the W-2 Delayed Cycle, which typically runs during the first week of each month, CARES will issue one payment in the next W-2 Pulldown Cycle for the participation period.

Example: On 2/26 a new W-2 AG is approved and confirmed on AGECE. No placement is entered at this time. On 3/7 (after the W-2 Delayed Cycle has run) the FEP places the participant into a CSJ placement with a W-2 Begin Date and Placement Begin Date of 2/26. A payment would be issued through the W-2 Pulldown Cycle in March for the participation period of 2/26 – 3/15.

Example: On 10/30 a FEP determines that an applicant's initial placement is CS1. On 11/7 the FEP changes the placement to a CSJ and backdates the CSJ to 10/30. CARES has already calculated and issued a payment based on the CS1 placement on 10/30 thru 10/31 during the W-2 Delayed Cycle on 11/6. If the FEP had entered the change prior to 11/6, CARES would have issued the appropriate payment amount. The FEP must calculate a supplemental payment for 10/30 and 10/31.

➤ **Note:** In this case the "ISSUE SUPPLEMENTAL PAYMENT" informational message would not have been displayed as this change in placement has occurred in the same participation period.

Future Date Rule: A Placement Begin Date cannot be a future date for an initial or subsequent W-2 placement within a W-2 episode.

Exception! A CMD placement cannot have a future Placement Begin Date if it is the initial W-2 placement of an episode since a W-2 Begin Date cannot be a future date and the Placement Begin Date for the initial W-2 placement in an episode must be the same as the W-2 Begin Date. However, it is rare that this should happen because the CMD placement is for those individuals who have been denied a W-2 time limit extension. Participants should be moved from a W-2 paid placement to CMD during the same W-2 episode, particularly since future dating of the Placement Begin Date is allowed for CMD placements.

For *subsequent* CMD placements, a future Placement Begin Date of up to 10 calendar days is allowed.

PLACEMENT END DATE

Backdating and Future Date

There are no rules related to backdating or future dating Placement End Dates because this date is auto-populated by CARES based on the W-2 End Date of a W-2 episode or, if a new placement is entered within a W-2 episode, the Placement Begin Date of the new W-2 placement. The Placement End Date of the previous placement is one day prior to the Placement Begin Date of the new placement.

CONTACTS

For Policy Related Questions: BW-2 Regional Office Staff

For CARES Processing Questions: BHCE CARES Information & Problem Resolution Center

*Program Categories – FS – FoodShare, MA – Medicaid, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – Food Stamp Employment and Training, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WIA – Workforce Investment Act, Other EP – Other Employment Programs.

Wisconsin Works Information (WPWW) CARES Screen Backdating and Future-dating Rules

BACKDATING		
	Rule	Exception
W-2 Begin Date	<i>For initial placements, the W-2 Begin Date can be backdated 10 calendar days or back to the date eligibility was confirmed as a pass, whichever is later. The Placement Begin Date must be the same as the W-2 Begin Date.</i>	<i>CMC: For an initial CMC placement, the W-2 Begin Date can be backdated up to the date eligibility was confirmed as a pass or up to the child's DOB, whichever is later.</i>
	<i>W-2 Begin Date must be after the W-2 End Date of the previous W-2 episode. It cannot be prior to the date eligibility actually began</i>	None
W-2 End Date	<i>The W-2 End Date cannot be backdated prior to the start of the W-2 participation period when entered after the W-2 Pulldown cycle. Also, it cannot be prior to the W-2 Begin Date.</i>	None
Placement Begin Date		
Initial	<i>The Placement Begin Date for all initial W-2 placements in a W-2 episode can be backdated to the date eligibility was confirmed as a pass or backdated up to 10 calendar days, whichever is later.</i>	<i>CMC: For initial CMC placements, the Placement Begin Date can be backdated to either the date the W-2 AG is confirmed as a pass or the baby's date of birth, whichever is later.</i>
Subsequent	<i>The Placement Begin Date for all subsequent W-2 placements in a W-2 episode can be backdated for up to 10 calendar days prior to the current date.</i>	<i>CMC: For subsequent CMC placements, the Placement Begin Date can be backdated to the date of the baby's date of birth.</i>
Placement End Date*	<i>No Backdating Rule</i>	None
FUTURE DATING		
	Rules	Exceptions
W-2 Begin Date	<i>A W-2 Begin Date cannot be a future date.</i>	None
W-2 End Date	<i>A W-2 End Date cannot be a future date.</i>	<i>CMC: An initial or subsequent CMC placement W-2 End Date may be a future date of up to 10 calendar days from the current date if the individual is leaving W-2 and not moving to a different placement.</i>
Placement Begin Date		
Initial	<i>A Placement Begin Date cannot be a future date for an initial or subsequent W-2 placement within a W-2 episode.</i>	<i>CMD: A CMD placement cannot have a future Placement Begin Date if it is the initial W-2 placement of an episode.</i>
Subsequent	<i>A Placement Begin Date cannot be a future date for an initial or subsequent W-2 placement within a W-2 episode.</i>	<i>CMD: When it is a subsequent placement, allow a future date for up to 10 calendar days.</i>
Placement End Date*	<i>No Future Dating Rule</i>	None

*There are no rules related to backdating or future dating Placement End Dates because this date is auto-populated by CARES.

May 19, 2006 OM 06-23